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June 19, 2001

OFFICE OF THE
EXECUTIVE SECRETARY (

David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: *BellSouth Telecommunications, Inc. Tariff to Introduce 2001 Key Business
Discount Program*
Docket No. 01-00461

Dear David:

Enclosed please find the original and thirteen copies of a Petition to Intervene and a petition to suspend the effective date of the above-captioned tariff filed on behalf of the Southeastern Competitive Carriers Association ("SECCA"). Please contact me or Whitney Malone with any questions.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry Walker by*
Henry Walker *wlm w/permission*

HW/wlm

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

June 19, 2001

IN RE: *BellSouth Telecommunications, Inc. Tariff to Introduce CCS7 Access
Arrangement Service*
Docket No. 01-00440

PETITION TO INTERVENE

The Southeastern Competitive Carriers Association ("SECCA") petitions the Authority to intervene as a matter of right in the above-captioned proceeding pursuant to T.C.A. § 4-5-310.

Members of SECCA provide competitive local exchange services in Tennessee and are concerned about the discriminatory and anti-competitive nature of the proposed tariff.

An order granting the petition is attached.

Respectfully submitted,

By: Henry Walker by WLM
Henry Walker, Esq.
Boult, Cummings, Conners & Berry, PLC *w/permission*
414 Union Street, Suite 1600
P. O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

June 19, 2001

IN RE: *BellSouth Telecommunications, Inc. Tariff to Introduce 2001 Key Business
Discount Program*
Docket No. 01-00461

ORDER

For good cause shown, the Authority finds that the Southeastern Competitive Carriers Association ("SECCA") is entitled to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310. As a Competitive Local Exchange Carriers ("CLECs") in Tennessee, SECCA members have an interest in the outcome of this proceeding. The petition is therefore GRANTED.

Chairman

ATTEST:

Executive Director

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re: *BellSouth Telecommunications, Inc. Tariff to Introduce 2001 Key Business Discount Program*

Docket No. 01-00461

PETITION OF THE SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION

The Southeastern Competitive Carriers Association ("SECCA") petitions the Tennessee Regulatory Authority ("TRA" or "Authority") to suspend the effective date of the above-captioned promotional tariff filed by BellSouth Telecommunications, Inc. ("BellSouth") on May 31, 2001. The scheduled effective date is June 26, 2001.

Members of SECCA provide competitive local exchange services in Tennessee and the rights and interests of SECCA members will be substantially affected by decisions made by the TRA in this proceeding.

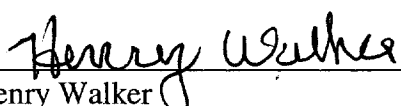
The tariff purports to be a thirty-day "promotional" tariff but, in fact, locks customers into contracts of eighteen-to-thirty-six months. This is not a promotional tariff since the effect of the tariff extends well beyond the ninety-day promotional period. Furthermore, the tariff offers discounts in some wire centers but not in others. There is no explanation in the tariff for this presumptively unreasonable discrimination.

Finally, it is SECCAs belief that similar tariffs have been withdrawn in Georgia, suspended in Alabama and are under investigation in Florida because of regulatory concerns.

Therefore, SECCA respectfully requests that:

- (1) the matters be set for hearing or other appropriate proceeding for purposes of receiving industry input;
- (2) the tariff and promotions be suspended pending further investigation; and
- (3) such other, further, general, specific and more equitable relief as may be just and proper under the circumstances.

Respectfully submitted,

 *by WLM -
Henry Walker* *in permission*
Henry Walker
Boult, Cummings, Conners & Berry PLC
414 Union St., Suite 1600
Nashville, TN 37219
Counsel for SECCA

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the ~~14~~^{19th} day of June, 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St.
Suite 2101
Nashville, TN 37201-3300

Timothy Phillips, Esq.
Office of the Consumer Advocate and Protection Division
Attorney General's Office
P.O. Box 20207
Nashville, TN 37202

Henry Walker by WLM
Henry Walker, Esq.